

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA
AT ELKINS**

MOUNTAIN VALLEY PIPELINE, LLC,

Plaintiff,

v.

**Civil Action No. 2:24-cv-12
Judge Kleeh**

JEROME JAMES WAGNER,

Defendant.

STIPULATION TO EXTEND DISCOVERY DEADLINE

Plaintiff Mountain Valley Pipeline, LLC (“MVP”), by counsel, and Jerome James Wagner (“Defendant”) (together, the “Parties”), by counsel, stipulate to the extension of the discovery deadline set forth in the Scheduling Order entered by this Court on August 20, 2024 (“Scheduling Order”), setting, among other deadlines, a discovery deadline of May 26, 2025. Pursuant to Paragraph No. 3 of the Scheduling Order, “[t]he conduct of any discovery which would require a later time limit shall be permitted only on the order of the Court or by filed stipulation of the parties, and only in cases that will not be delayed for trial thereby.” Scheduling Order at 4. The Parties confirm that the extension of the discovery deadline as outlined below will not delay trial or any other deadlines set by this Court in the Scheduling Order. The parties hereby stipulate that both sides may take depositions after the Court’s May 26, 2025, deadline for completion of discovery, although the May 26, 2025 discovery deadline shall otherwise remain in effect. The Parties agree all depositions will be completed by July 31, 2025.

STIPULATED AND AGREED TO BY:

Respectfully submitted,

MOUNTAIN VALLEY PIPELINE, LLC
By Counsel,

/s/ Austin D. Rogers

Timothy M. Miller (WVSB No. 2564)
Robert M. Stonestreet (WVSB No. 9370)
Jennifer J. Hicks (WVSB No. 11423)
Austin D. Rogers (WVSB No. 13919)
Babst Calland, P.C.
300 Summer Street, Suite 1000
Charleston, WV 25301
Telephone: (681) 205-8888
Facsimile: (681) 205-8814
tmiller@babstcalland.com
rstonestreet@babstcalland.com
jhicks@babstcalland.com
arogers@babstcalland.com

and

JEROME JAMES WAGNER
By Counsel,

/s/ William V. DePaulo

William V. DePaulo (WVSB #995)
P O Box 1711
Lewisburg, WV 24901
Telephone: 304-342-5588
Facsimile: 866-850-1501
william.depaulo@gmail.com

and

Jonathan Sidney, Esquire
Climate Defense Project
PO Box 97
Forest Hill, WV 24935
jsidney@climatedefenseproject.org